

01-19-90

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51-80
111

DATE			REG. NO.
01	04	90	01355

Pay Exactly *****64,672.11 Dollars and

11 Cents

NET AMOUNT
*****64,672.11

TO: EPA HAZARDOUS SUBSTANCE
THE SUPERFUND
ORDER OF

BANK OF BOSTON
CONNECTICUT
WATERBURY, CONN.

US EPA Region V
Finance & Accounting
230 South Dearborn Street
Chicago, Illinois 60604

REC'D UNDER CD. NO. 065
1/9/90

DATED

64,672.11

ORMET CORPORATION

[Signature]
Nazem

Nonresponsive

John D. Reggi
Project Coordinator
Ormet Corporation
Route 7
P.O. Box 17
Hannibal, Ohio 43931

HSCR
20X8145.4
\$64,672.11
ORMET
OHIO

RE: Ormet Site

11/22/89

Dear Sir :

The enclosed billing is for the recovery of costs incurred by the U.S. Environmental Protection Agency (EPA) for response activity, performed under the authority of the Comprehensive Environmental Response Compensation and Liability Act as Amended for the period thru 3/31/87. These costs were incurred for the Ormet, EPA is due \$64,672.11 on Dec. 22, 1989. This bill is solely for recovery of government response costs, any fines and/or civil penalties due will be billed separately.

This billing invoice is being forwarded to you for payment based on the enclosed consent order. Please make your check payable to EPA Hazardous Substance Superfund and forward your payment to:

EPA Region V
Attention: Superfund Accounting
P.O. Box 70753
Chicago, IL 60673

To avoid additional charges, payment must be received within 30 days of the bill date. If not received, interest will accrue, from the bill date at the rate of 8.47% from October 1, 1989 to September 30, 1990. If there are any questions please contact V. Simmons at (312) 353-4885

FILE COPY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

John D. Reggi
Project Coordinator
Ormet Corporation
Route 7
P.O. Box 17
Hannibal, Ohio 43931

RE: Ormet Site

12/06/89

Dear Sir :

The enclosed billing is for the recovery of costs incurred by the U.S. Environmental Protection Agency (EPA) for response activity, performed under the authority of the Comprehensive Environmental Response Compensation and Liability Act as Amended for the period thru 3/31/87. These costs were incurred for the Ormet site, EPA is due \$64,672.11 on Jan. 06, 1990. This bill is solely for recovery of government response costs, any fines and/or civil penalties due will be billed separately.

This billing invoice is being forwarded to you for payment based on the enclosed consent order. Please make your check payable to EPA Hazardous Substance Superfund and forward your payment to:

EPA Region V
Attention: Superfund Accounting
P.O. Box 70753
Chicago, IL 60673

To avoid additional charges, payment must be received within 30 days of the bill date. If not received, interest will accrue, from the bill date at the rate of 8.47% from October 1, 1989 to September 30, 1990. If there are any questions please contact V. Simmons at (312) 353-4885.

To ensure that your payment is properly recorded by EPA for the period thru 3/31/87, the following information must be included on the face of your payment check:

Ormet, OH
Account No. OT012
Site No. 1Z

Any questions or problems regarding this billing should be directed to:

U.S. Environmental Protection Agency
ATTN: Vanessa Simmons
230 South Dearborn 5MFS-14
Chicago, Illinois 60604

Thank you for your cooperation

Enclosures

Sincerely yours,

~~757~~ IVARS P. ANTENS, CHIEF
FINANCIAL MGMT, BR.

Ivars P. Antens
Financial Management Officer

cc: Rhonda E. McBride (5HS-11)
Remedial Project Manager
U.S. E.P.A.
230 S. Dearborn
Chicago, IL 60604

Tom Marks (5HS-12)
Regional Cost Recovery Coordinator
Superfund Program Management Branch
U.S. E.P.A.
230 S. Dearborn
Chicago, IL 60604

Jane Lupton, Attorney
5CS-TUB-3
U.S. E.P.A.
230 S. Dearborn
Chicago, IL 60604

CUMULATIVE COST SUMMARY
ORMET, OHIO
SUPERFUND SITE # 1Z
PREPARED NOVEMBER 21, 1989.

<u>EPA EXPENDITURES</u>		Costs through to March 31, 1987
EPA PAYROLL ---		
Headquarters	\$	0.00
Regional		17,675.57
EPA INDIRECT COSTS ---		
---		43,635.80
EPA TRAVEL ---		
Headquarters		0.00
Regional		3,330.74
MISCELLANEOUS REGIONAL COSTS---		
--Air Express		30.00
TOTAL EPA COSTS BEFORE INTEREST		\$ 64,672.11
Pre-judgement Interest		0.00
TOTAL EPA COSTS FOR ORMET	\$	<u>64,672.11</u>

COST SUMMARY DATE: 11/18/89

Page 1

ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)

Prepared: 10/09/86

Cost Data From Pay Period 01 Of FY 81 Through Pay Period 12 of FY 87

EPA PAYROLL -- HEADQUARTERS

DOCUMENTATION: Copies of Applicable Timecards/Timesheets

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR/ PAY PERIOD</u>	<u>HOURS</u>	<u>AMOUNT (\$)</u>
TOTAL EPA HEADQUARTERS PAYROLL:		0.00	0.00

COST SUMMARY DATE: 11/19/89

Page 1

ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)

Prepared: 10/09/86

Cost Data From Pay Period 01 Of FY 81 Through Pay Period 12 of FY 87

EPA PAYROLL — REGIONAL

DOCUMENTATION: Copies of Applicable Timecards/Timesheets

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR/ PAY PERIOD</u>	<u>HOURS</u>	<u>AMOUNT (\$)</u>
AMENDOLA, GARY A.	86-23	0.00	0.00
	SUBTOTAL	0.00	0.00
ASKEW, SYLVIA A.	87-11	2.00	18.15
	87-12	1.00	9.07
	SUBTOTAL	3.00	27.22
BRUCE, DONALD J.	86-17	8.00	163.95
	SUBTOTAL	8.00	163.95
FOX, CHARLES PAUL	86-10	5.00	45.91
	SUBTOTAL	5.00	45.91
HONG, SOOBOK L.	86-20	13.00	232.96
	SUBTOTAL	13.00	232.96
JONES, STEVEN W.	86-03	4.00	50.94
	86-05	4.50	57.37
	86-06	12.00	152.84
	86-08	3.80	49.49
	86-09	3.00	39.09
	86-10	0.80	10.40
	86-11	15.80	205.24
	86-12	24.00	312.68
	86-13	25.80	335.53
	86-14	1.50	19.59
	86-14	15.20	198.68

COST SUMMARY DATE: 11/19/89

Page 2

ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)

Prepared: 10/09/86

Cost Data From Pay Period 01 Of FY 81 Through Pay Period 12 of FY 87

EPA PAYROLL -- REGIONAL

DOCUMENTATION: Copies of Applicable Timecards/Timesheets

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR/ PAY PERIOD</u>	<u>HOURS</u>	<u>AMOUNT (\$)</u>
JONES, STEVEN W. (Continued)			
	86-15	24.80	321.36
	86-16	35.80	464.18
	86-17	40.00	519.35
	86-18	8.80	113.63
	86-19	31.50	409.02
	86-20	35.50	460.96
	SUBTOTAL	286.80	3720.35
KYTE, LAWRENCE W.			
	86-11	0.80	16.47
	86-13	0.50	10.93
	86-14	0.20	5.43
	SUBTOTAL	1.50	32.83
LEBLANC, PAULINE M.			
	86-16	6.00	103.39
	86-17	11.00	189.55
	86-18	23.00	396.32
	86-18	4.00	68.93
	86-19	51.00	878.80
	86-20	50.00	861.58
	86-21	19.00	327.40
	86-22	18.00	310.15
	86-23	4.00	68.91
	86-25	1.00	17.21
	86-26	24.00	413.56
	86-27	16.00	275.70
	87-01	11.00	189.52
	87-02	19.00	337.69
	87-03	31.00	550.99
	87-04	58.00	1030.87
	87-05	31.00	550.99
	87-06	39.00	693.18
	87-07	15.00	266.61
	87-08	13.00	239.18

COST SUMMARY DATE: 11/19/89

Page 3

ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)

Prepared: 10/09/86

Cost Data From Pay Period 01 Of FY 81 Through Pay Period 12 of FY 87

EPA PAYROLL -- REGIONAL

DOCUMENTATION: Copies of Applicable Timecards/Timesheets

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR/ PAY PERIOD</u>	<u>HOURS</u>	<u>AMOUNT (\$)</u>
LEBLANC, PAULINE M. (Continued)			
	87-09	45.00	827.92
	87-10	23.00	423.17
	87-11	3.00	55.20
	87-12	13.00	239.18
	SUBTOTAL	528.00	9316.00
LUPTON, JANE MARGARET			
	86-16	13.00	200.54
	86-17	19.00	293.10
	86-18	0.50	7.78
	86-19	1.50	23.20
	86-22	2.80	42.46
	86-23	0.50	7.78
	86-24	0.50	7.78
	86-26	4.00	61.69
	86-27	12.00	185.07
	87-01	1.50	23.09
	87-02	3.20	49.33
	87-03	8.50	131.16
	87-04	27.50	424.20
	87-05	16.80	258.38
	87-06	6.50	103.37
	87-08	10.50	202.24
	87-09	26.50	509.41
	87-10	36.00	691.95
	87-11	14.00	269.09
	SUBTOTAL	204.80	3491.62
MOSHMAN, DIANE K.			
	86-21	1.00	16.48
	SUBTOTAL	1.00	16.48
SUGGS-WILLIS, DOROTHY L			
	87-10	10.00	83.42

COST SUMMARY DATE: 11/19/89
ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)
Prepared: 10/09/86
Cost Data From Pay Period 01 Of FY 81 Through Pay Period 12 of FY 87

Page 4

EPA PAYROLL -- REGIONAL

DOCUMENTATION: Copies of Applicable Timecards/Timesheets

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR/ PAY PERIOD</u>	<u>HOURS</u>	<u>AMOUNT (\$)</u>
SUGGS-WILLIS, DOROTHY L (Continued)			
	SUBTOTAL	10.00	83.42
TAYLOR, DARIUS L.	87-11	0.50	3.84
	SUBTOTAL	0.50	3.84
TAYLOR, KATHLEEN J.	87-01	3.00	33.37
	SUBTOTAL	3.00	33.37
THOMAS, FRANCIS	86-19	2.00	36.98
	SUBTOTAL	2.00	36.98
TUNSTILL, MARION	87-04	10.00	75.45
	87-05	21.00	158.37
	87-06	8.00	60.33
	87-09	8.00	70.60
	87-10	12.00	105.89
	SUBTOTAL	59.00	470.64
TOTAL EPA REGIONAL PAYROLL:		1125.60	17675.57

SUMMARY OF INDIRECT COSTS FOR ORMET CORPORATION, OHIO (SSID: 5 1Z)

DATE: 11/19/89

Data From Pay Period 01 Of FY 81 Through Pay Period 12 Of FY 87

Total Direct Hours x Rate(\$) = Subtotal(\$)

FY 1986	542.80	51	27682.80
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FY 1987	301.00	53	15953.00
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TOTAL INDIRECT COSTS TO CLAIM IN COST RECOVERY:	43635.80
--	----------

DATE: 11/19/89

Data From Pay Period 01 Of FY 81 To Pay Period 12 Of FY 87.

FISCAL YEAR	EMPLOYEE NAME	AH RC	NUMBER OF HOURS ATTRIBUTED TO SITE WORK	INDIRECT COSTS RATE (\$)	INDIRECT COSTS (\$)
86	AMENDOLA, GARY A.	05F	0.00		
	BRUCE, DONALD J.	05F	8.00		
	FOX, CHARLES PAUL	05F	5.00		
	HONG, SOOBOK L.	05F	13.00		
	JONES, STEVEN W.	05F	286.80		
	LEBLANC, PAULINE M.	05F	227.00		
	MOSHMAN, DIANE K.	05F	1.00		
	THOMAS, FRANCIS	05W	2.00		
	SUBTOTAL		542.80	51	27682.80
87	LEBLANC, PAULINE M.	05F	301.00		
	SUBTOTAL		301.00	53	15953.00
	TOTAL HOURS AND INDIRECT COSTS		843.80		43635.80

COST SUMMARY DATE: 11/18/89
ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)
Prepared: 10/09/86
Cost Data From 10/01/80 Through 03/31/87

Page 1

EPA TRAVEL - HEADQUARTERS

DOCUMENTATION: Copies of Travel Authorizations, Travel Vouchers
and Treasury Schedules

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR</u>	<u>TRAVEL AUTHORIZATION NO.</u>	<u>AMOUNT</u>	<u>PAID TREASURY SCHEDULE NUMBER AND TRANSACTION DATE</u>
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TOTAL EPA HEADQUARTERS TRAVEL \$ 0.00

COST SUMMARY DATE: 11/18/89
ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)
Prepared: 10/09/86
Cost Data From 10/01/80 Through 03/31/87

Page 1

EPA TRAVEL - REGIONAL

DOCUMENTATION: Copies of Travel Authorizations, Travel Vouchers
and Treasury Schedules

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR</u>	<u>TRAVEL AUTHORIZATION NO.</u>	<u>AMOUNT</u>	<u>PAID TREASURY SCHEDULE NUMBER AND TRANSACTION DATE</u>
BRUCE, DONALD J.	86	OTRIS64172	158.00	V0321 06/05/86
		000TS64172	54.00	V0321 06/05/86
		SUBTOTAL \$	212.00	
JONES, STEVEN W.	86	OTRIS62312	76.00	V0214 03/10/86
		000TS62312	68.81	V0214 03/10/86
		OTRIS62955	152.00	V0254 04/09/86
		000TS62955	113.63	V0254 04/09/86
		OTRIS64151	158.00	V0362 07/03/86
		000TS64151	60.87	V0362 07/03/86
		OTRIS64802	311.00	V0366 07/07/86
		000TS64802	157.14	V0366 07/07/86
		SUBTOTAL \$	1097.45	
LEBLANC, PAULINE M.	86	OTRIS64801	311.00	V0362 07/03/86
		000TS64801	217.86	V0362 07/03/86
	87	OTRIS70997	282.00	V0126 12/10/86
		000TS70997	239.22	V0126 12/10/86
		OTRIS66570	158.00	V0015 10/07/86
		000TS66570	41.16	V0015 10/07/86
		SUBTOTAL \$	1249.24	
LUPTON, JANE MARGARET	87	OTRIS71049	210.00	V0119 12/05/86
		000TS71049	117.50	V0119 12/05/86
		OTRIS64137	158.00	JV001 10/28/86
		000TS64137	116.05	JV001 10/28/86
		OTRIS66575	158.00	V0020 10/10/86
		000TS66575	12.50	V0020 10/10/86
		SUBTOTAL \$	772.05	

TOTAL EPA REGIONAL TRAVEL \$ 3330.74

COST SUMMARY DATE: 11/22/89
ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)
Prepared: 10/09/86
Cost Data From 10/01/69 To 03/31/87

Page 1

UNIDENTIFIED (UNI) CONTRACT

CONTRACTOR:

CONTRACT NO: 5391

PROJECT OFFICER:

DATES OF SERVICE: FROM: / / TO: / /

SUMMARY OF SERVICE:

TOTAL CONTRACTOR COST: \$ 30.00

DOCUMENTATION: Copies of Applicable Paid Vouchers and Treasury Schedules

VOUCHER NUMBER -----	VOUCHER DATE -----	VOUCHER AMOUNT -----	TREASURY SCHEDULE NUMBER AND TRANSACTION DATE -----	SITE AMOUNT -----
LUPTON J.	/ /	0.00	V0259 03/23/87	30.00

ORMET CORPORATION

P.O. BOX 176
HANNIBAL, OHIO 43931

January 4, 1990

3

EPA Region V
P. O. Box 70753
Chicago, Illinois 60673

Attention: Superfund Accounting

Re: Ormet Site Account No. OT012, OT013 and OT014

Dear Sir or Madam:

Enclosed with this letter are three checks payable to the "EPA Hazardous Substance Superfund." The first check is in the amount of \$64,672.11 for Account No. OT012. The second check is in the amount of \$102,721.83 for Account No. OT013. The third check is in the amount of \$186,709.00 for Account No. OT014.

The enclosed payments were prepared and submitted in accordance with and reliance upon the instructions set forth in letters signed by Ivars P. Antens dated December 6, 1989. We note that those instructions deviate from the provisions of Subsection XXV-C of the March, 1987 Consent Order between the parties (In the Matter of Ormet Corporation, U.S. EPA, Docket No. V-W-87-C-013). We presume that Mr. Antens' letters of December 6, 1989 supersede the provisions of Subsection XXV-C and that Ormet's payments in accordance therewith are in full compliance with the Consent Order.

While Ormet is paying the full amounts billed under Account Nos. OT012, OT013 and OT014, it is doing so under protest.

Subsection XXV-B of the Consent Order specifically provides that:

. . . U.S. EPA . . . shall submit an accounting to [Ormet] for all oversight costs incurred by the U.S. EPA . . . with respect to this Consent Order . . . including, but not limited to, the costs incurred by the U.S. EPA in having a qualified person oversee the conduct of the RI/FS pursuant to Section 104(a) of CERCLA."
(Emphasis added).

Per my letter dated June 2, 1989 to Rhonda E. McBride, U.S. EPA's Remedial Project Manager, Ormet objected to the initial statements of oversight costs which were submitted to Ormet by Ms. McBride's letter of May 23, 1989. By letter dated December 8, 1989, Mr. Antens agreed with Ormet that the statements sent by Ms. McBride's letter of May 23 were not proper billings under the Consent Order.

The "billings" submitted to Ormet by Mr. Antens' letters of December 6, 1989 contain more accounting detail than previously provided with respect to EPA's internal costs. However, the December 6 billings do not contain any accounting of outside contractor costs. Therefore, Ormet must once again remind U.S. EPA of its obligations under the Consent Order and we hereby demand that U.S. EPA comply with the provisions of the Consent Order with respect to providing an adequate accounting of U.S. EPA's oversight costs.

Ormet's payment in response to the inadequately supported billings at this time is in keeping with our ongoing commitment to deal with U.S. EPA in good faith. However, Ormet will make no further cost reimbursement payments to U.S. EPA unless and until it receives a full and proper accounting for the periods covered by the December 6 billings.

We look forward to receiving the required accounting information promptly.

Sincerely,



J. D. Reggi
Ormet Project Coordinator

JDR:smg
Enclosures

cc: Ivars P. Antens
Vanessa Simmons
Rhonda E. McBride
Jane Lupton
John W. Ubinger, Jr.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

JUL 27 1990

REPLY TO THE ATTENTION OF:

P 433 154 071

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John D. Reggi
Project Coordinator
Ormet Corporation
Route 7
Hannibal, Ohio 43931

RE: Ormet Site

Dear Mr. Reggi:

On May 24, 1990 the U.S. Environmental Protection Agency (EPA) submitted an accounting of costs incurred at the Ormet site for the period of 4/1/89 thru 3/31/90 and demanded payment of these costs, totalling \$126,144.10. In your letter dated June 15, 1990, you stated that the "itemized statements" do not constitute an accounting of oversight costs as required by Section XXV of the Consent Order.

The U.S. EPA strongly disagrees with your assertion that the U.S. EPA itemized bill does not constitute an accounting for these costs. Section XXV(B) of the Ormet Corporation Consent Order states that you are to receive an "accounting" "of all oversight costs incurred by the U.S. EPA." U.S. EPA defines an "accounting" to be an itemized billing, which is what you were provided with. In addition, the U.S. EPA does not receive the level of detail you have requested regarding these costs. Moreover, as you are aware, much of the information that you have requested constitutes Confidential Business Information.

It is U.S. EPA's position that the full amount of the bill; (\$127,871.16), with interest is due and payable within 60 days of receipt of this letter. In addition, the U.S. EPA reserves its rights to undertake appropriate action to insure collection of all amounts owed to the U.S. EPA.

Thank you for your cooperation.

Sincerely yours,

Ivars P. Antens, Chief
Financial Management Branch

Enclosures

cc: Rhonda McBride, 5HS-11
Susan Swales, 5HSM-TUB-7
Jane Lupton, 5CS-TUB-3

[Signature]
SMFS-14
7/24/90

[Signature]
SMFS-14
7/25/90

[Signature]
SMFS-14
7/26/90

[Signature]
SMFS-14
7/27/90

[Signature]
7/27/90

SMF
[Signature]
7/27/90



UNITED STATES

CERTIFIED MAIL
RETURN RECEIPT REQUEST

MAY 24 1990

John D. Reggi
Project Coordinator
Ormet Corporation
Route 7
P.O. Box 17
Hannibal, Ohio 43931

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested. 1. <input checked="" type="checkbox"/> Show to whom delivered, date, and addressee's address. (Extra charge) 2. <input type="checkbox"/> Restricted Delivery (Extra charge)	
3. Article Addressed to: John D. Reggi Project Coordinator Ormet Corporation Route 7 P.O. Box 17 Hannibal, OH 43931	4. Article Number P 433 153 827 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature - Address X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>Sammy Piatt</i>	
7. Date of Delivery 5/29/90	

PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

RE: Ormet Site

Dear Mr Reggi:

The enclosed billing is for the recovery of costs incurred by the U.S. Environmental Protection Agency (EPA) for response activity, performed under the authority of the Comprehensive Environmental Response Compensation and Liability Act as Amended for the period of 4/1/89 thru 3/31/90. These costs were incurred for the Ormet site, EPA is due \$126,144.10. This bill is solely for recovery of government oversight costs, any fines and/or civil penalties due will be billed separately.

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EPA Region V
Attention: Superfund Accounting
P.O. Box 70753
Chicago, IL 60673

To avoid additional charges, payment must be received within 30 days of receipt of this bill. If not received, interest will accrue, from the receipt date at the rate of 8.47% from October 1, 1989 to September 31, 1990. If there are any questions please contact V. Simmons at (312) 353-4885.



UNITED STATES

CERTIFIED MAIL
RETURN RECEIPT REQUEST

<p>SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.</p> <p>1. <input checked="" type="checkbox"/> Show to whom delivered, date, and addressee's address. (Extra charge) 2. <input type="checkbox"/> Restricted Delivery (Extra charge)</p>	
3. Article Addressed to: John D. Reggi Project Coordinator Ormet Corporation Route 7 Hannibal, OH 43931	4. Article Number P 433 154 071 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature — Agent X <i>J. Reggi</i>	
7. Date of Delivery 9/1/90	

PS Form 3811, Apr. 1989

★ U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

John D. Reggi
Project Coordinator
Ormet Corporation
Route 7
Hannibal, Ohio 43931

RE: Ormet Site

Dear Mr. Reggi:

On May 24, 1990 the U.S. Environmental Protection Agency (EPA) submitted an accounting of costs incurred at the Ormet site for the period of 4/1/89 thru 3/31/90 and demanded payment of these costs, totalling \$126,144.10. In your letter dated June 15, 1990, you stated that the "itemized statements" do not constitute an accounting of oversight costs as required by Section XXV of the Consent Order.

The U.S. EPA strongly disagrees with your assertion that the U.S. EPA itemized bill does not constitute an accounting for these costs. Section XXV(B) of the Ormet Corporation Consent Order states that you are to receive an "accounting" "of all oversight costs incurred by the U.S. EPA." U.S. EPA defines an "accounting" to be an itemized billing, which is what you were provided with. In addition, the U.S. EPA does not receive the level of detail you have requested regarding these costs. Moreover, as you are aware, much of the information that you have requested constitutes Confidential Business Information.

It is U.S. EPA's position that the full amount of the bill; (\$127,871.16), with interest is due and payable within 60 days of receipt of this letter. In addition, the U.S. EPA reserves its rights to undertake appropriate action to insure collection of all amounts owed to the U.S. EPA.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

John D. Reggi
Project Coordinator
Ormet Corporation
Route 7
P.O. Box 17
Hannibal, Ohio 43931

RE: Ormet Site

12/06/89

Dear Sir :

The enclosed billing is for the recovery of costs incurred by the U.S. Environmental Protection Agency (EPA) for response activity, performed under the authority of the Comprehensive Environmental Response Compensation and Liability Act as Amended for the period thru 3/31/87. These costs were incurred for the Ormet site, EPA is due \$64,672.11 on Jan. 06, 1990. This bill is solely for recovery of government response costs, any fines and/or civil penalties due will be billed separately.

This billing invoice is being forwarded to you for payment based on the enclosed consent order. Please make your check payable to EPA Hazardous Substance Superfund and forward your payment to:

EPA Region V
Attention: Superfund Accounting
P.O. Box 70753
Chicago, IL 60673

To avoid additional charges, payment must be received within 30 days of the bill date. If not received, interest will accrue, from the bill date at the rate of 8.47% from October 1, 1989 to September 30, 1990. If there are any questions please contact V. Simmons at (312) 353-4885.

To ensure that your payment is properly recorded by EPA for the period thru 3/31/87, the following information must be included on the face of your payment check:

Ormet, OH
Account No. OT012
Site No. 1Z

Any questions or problems regarding this billing should be directed to:

U.S. Environmental Protection Agency
ATTN: Vanessa Simmons
230 South Dearborn 5MFS-14
Chicago, Illinois 60604

Thank you for your cooperation

Enclosures

Sincerely yours,

~~/s/~~ IVARS P. ANTENS, CHIEF
FINANCIAL MGMT, BR.

Ivars P. Antens
Financial Management Officer

cc: Rhonda E. McBride (5HS-11)
Remedial Project Manager
U.S. E.P.A.
230 S. Dearborn
Chicago, IL 60604

Tom Marks (5HS-12)
Regional Cost Recovery Coordinator
Superfund Program Management Branch
U.S. E.P.A.
230 S. Dearborn
Chicago, IL 60604

Jane Lupton, Attorney
5CS-TUB-3
U.S. E.P.A.
230 S. Dearborn
Chicago, IL 60604

CUMULATIVE COST SUMMARY
ORMET, OHIO
SUPERFUND SITE # 1Z
PREPARED NOVEMBER 21, 1989

<u>EPA EXPENDITURES</u>	Costs through to March 31, 1987	
EPA PAYROLL --		
Headquarters	\$	0.00
Regional		17,675.57
EPA INDIRECT COSTS --		
--		43,635.80
EPA TRAVEL --		
Headquarters		0.00
Regional		3,330.74
MISCELLANEOUS REGIONAL COSTS--		
--Air Express		30.00
TOTAL EPA COSTS BEFORE INTEREST		\$ 64,672.11
Pre-judgement Interest		0.00
TOTAL EPA COSTS FOR ORMET		\$ 64,672.11

COST SUMMARY DATE: 11/18/89
ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)
Prepared: 10/09/86
Cost Data From Pay Period 01 Of FY 81 Through Pay Period 12 of FY 87

Page 1

EPA PAYROLL -- HEADQUARTERS

DOCUMENTATION: Copies of Applicable Timecards/Timesheets

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR/ PAY PERIOD</u>	<u>HOURS</u>	<u>AMOUNT (\$)</u>
TOTAL EPA HEADQUARTERS PAYROLL:		0.00	0.00

COST SUMMARY DATE: 11/19/89
ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)
Prepared: 10/09/86
Cost Data From Pay Period 01 Of FY 81 Through Pay Period 12 of FY 87

Page 1

EPA PAYROLL -- REGIONAL

DOCUMENTATION: Copies of Applicable Timecards/Timesheets

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR/ PAY PERIOD</u>	<u>HOURS</u>	<u>AMOUNT (\$)</u>
AMENDOLA, GARY A.	86-23	0.00	0.00
	SUBTOTAL	0.00	0.00
ASKEW, SYLVIA A.	87-11	2.00	18.15
	87-12	1.00	9.07
	SUBTOTAL	3.00	27.22
BRUCE, DONALD J.	86-17	8.00	163.95
	SUBTOTAL	8.00	163.95
FOX, CHARLES PAUL	86-10	5.00	45.91
	SUBTOTAL	5.00	45.91
HONG, SOOBOK L.	86-20	13.00	232.96
	SUBTOTAL	13.00	232.96
JONES, STEVEN W.	86-03	4.00	50.94
	86-05	4.50	57.37
	86-06	12.00	152.84
	86-08	3.80	49.49
	86-09	3.00	39.09
	86-10	0.80	10.40
	86-11	15.80	205.24
	86-12	24.00	312.68
	86-13	25.80	335.53
	86-14	1.50	19.59
	86-14	15.20	198.68

COST SUMMARY DATE: 11/19/89
ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)
Prepared: 10/09/86
Cost Data From Pay Period 01 Of FY 81 Through Pay Period 12 of FY 87

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EPA PAYROLL -- REGIONAL

DOCUMENTATION: Copies of Applicable Timecards/Timesheets

EMPLOYEE NAME -----	FISCAL YEAR/ PAY PERIOD -----	HOURS -----	AMOUNT (\$) -----
JONES, STEVEN W. (Continued)			
	86-15	24.80	321.36
	86-16	35.80	464.18
	86-17	40.00	519.35
	86-18	8.80	113.63
	86-19	31.50	409.02
	86-20	35.50	460.96
	SUBTOTAL	286.80	3720.35
KYTE, LAWRENCE W.			
	86-11	0.80	16.47
	86-13	0.50	10.93
	86-14	0.20	5.43
	SUBTOTAL	1.50	32.83
LEBLANC, PAULINE M.			
	86-16	6.00	103.39
	86-17	11.00	189.55
	86-18	23.00	396.32
	86-18	4.00	68.93
	86-19	51.00	878.80
	86-20	50.00	861.58
	86-21	19.00	327.40
	86-22	18.00	310.15
	86-23	4.00	68.91
	86-25	1.00	17.21
	86-26	24.00	413.56
	86-27	16.00	275.70
	87-01	11.00	189.52
	87-02	19.00	337.69
	87-03	31.00	550.99
	87-04	58.00	1030.87
	87-05	31.00	550.99
	87-06	39.00	693.18
	87-07	15.00	266.61
	87-08	13.00	239.18

COST SUMMARY DATE: 11/19/89

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ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)

Prepared: 10/09/86

Cost Data From Pay Period 01 Of FY 81 Through Pay Period 12 of FY 87

EPA PAYROLL -- REGIONAL

DOCUMENTATION: Copies of Applicable Timecards/Timesheets

EMPLOYEE NAME	FISCAL YEAR/ PAY PERIOD	HOURS	AMOUNT (\$)
LEBLANC, PAULINE M. (Continued)	87-09	45.00	827.92
	87-10	23.00	423.17
	87-11	3.00	55.20
	87-12	13.00	239.18
	SUBTOTAL	528.00	9316.00
LUPTON, JANE MARGARET	86-16	13.00	200.54
	86-17	19.00	293.10
	86-18	0.50	7.78
	86-19	1.50	23.20
	86-22	2.80	42.46
	86-23	0.50	7.78
	86-24	0.50	7.78
	86-26	4.00	61.69
	86-27	12.00	185.07
	87-01	1.50	23.09
	87-02	3.20	49.33
	87-03	8.50	131.16
	87-04	27.50	424.20
	87-05	16.80	258.38
	87-06	6.50	103.37
	87-08	10.50	202.24
	87-09	26.50	509.41
	87-10	36.00	691.95
	87-11	14.00	269.09
	SUBTOTAL	204.80	3491.62
MOSHMAN, DIANE K.	86-21	1.00	16.48
	SUBTOTAL	1.00	16.48
SUGGS-WILLIS, DOROTHY L	87-10	10.00	83.42

COST SUMMARY DATE: 11/19/89

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ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)

Prepared: 10/09/86

Cost Data From Pay Period 01 Of FY 81 Through Pay Period 12 of FY 87

EPA PAYROLL -- REGIONAL

DOCUMENTATION: Copies of Applicable Timecards/Timesheets

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR/ PAY PERIOD</u>	<u>HOURS</u>	<u>AMOUNT (\$)</u>
SUGGS-WILLIS, DOROTHY L (Continued)			
	SUBTOTAL	10.00	83.42
TAYLOR, DARIUS L.	87-11	0.50	3.84
	SUBTOTAL	0.50	3.84
TAYLOR, KATHLEEN J.	87-01	3.00	33.37
	SUBTOTAL	3.00	33.37
THOMAS, FRANCIS	86-19	2.00	36.98
	SUBTOTAL	2.00	36.98
TUNSTILL, MARION	87-04	10.00	75.45
	87-05	21.00	158.37
	87-06	8.00	60.33
	87-09	8.00	70.60
	87-10	12.00	105.89
	SUBTOTAL	59.00	470.64
TOTAL EPA REGIONAL PAYROLL:		1125.60	17675.57

SUMMARY OF INDIRECT COSTS FOR ORMET CORPORATION, OHIO (SSID: 5 1Z)

DATE: 11/19/89

Data From Pay Period 01 Of FY 81 Through Pay Period 12 Of FY 87

Total Direct Hours x Rate(\$) = Subtotal(\$)

FY 1986	542.80	51	27682.80
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FY 1987	301.00	53	15953.00
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TOTAL INDIRECT COSTS TO CLAIM IN COST RECOVERY:	43635.80
--	----------

DATE: 11/19/89

Data From Pay Period 01 Of FY 81 To Pay Period 12 Of FY 87

FISCAL		AH	NUMBER OF HOURS	INDIRECT	
YEAR	EMPLOYEE NAME	RC	ATTRIBUTED TO SITE WORK	COSTS RATE (\$)	INDIRECT COSTS (\$)
-----	-----	---	-----	-----	-----
86	AMENDOLA, GARY A.	05F	0.00		
	BRUCE, DONALD J.	05F	8.00		
	FOX, CHARLES PAUL	05F	5.00		
	HONG, SOOBOK L.	05F	13.00		
	JONES, STEVEN W.	05F	286.80		
	LEBLANC, PAULINE M.	05F	227.00		
	MOSHMAN, DIANE K.	05F	1.00		
	THOMAS, FRANCIS	05W	2.00		
			-----	--	-----
		SUBTOTAL	542.80	51	27682.80
87	LEBLANC, PAULINE M.	05F	301.00		
			-----	--	-----
		SUBTOTAL	301.00	53	15953.00
TOTAL HOURS AND INDIRECT COSTS			843.80		43635.80

COST SUMMARY DATE: 11/18/89
ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)
Prepared: 10/09/86
Cost Data From 10/01/80 Through 03/31/87

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EPA TRAVEL - HEADQUARTERS

DOCUMENTATION: Copies of Travel Authorizations, Travel Vouchers
and Treasury Schedules

EMPLOYEE NAME	FISCAL YEAR	TRAVEL AUTHORIZATION NO.	AMOUNT	PAID TREASURY SCHEDULE NUMBER AND TRANSACTION DATE
-----	-----	-----	-----	-----
TOTAL EPA HEADQUARTERS TRAVEL \$			0.00	

COST SUMMARY DATE: 11/18/89
 ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)
 Prepared: 10/09/86
 Cost Data From 10/01/80 Through 03/31/87

Page 1

EPA TRAVEL - REGIONAL

DOCUMENTATION: Copies of Travel Authorizations, Travel Vouchers
 and Treasury Schedules

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR</u>	<u>TRAVEL AUTHORIZATION NO.</u>	<u>AMOUNT</u>	<u>PAID TREASURY SCHEDULE NUMBER AND TRANSACTION DATE</u>	
BRUCE, DONALD J.	86	OTRIS64172	158.00	V0321	06/05/86
		000TS64172	54.00	V0321	06/05/86
		SUBTOTAL \$	212.00		
JONES, STEVEN W.	86	OTRIS62312	76.00	V0214	03/10/86
		000TS62312	68.81	V0214	03/10/86
		OTRIS62955	152.00	V0254	04/09/86
		000TS62955	113.63	V0254	04/09/86
		OTRIS64151	158.00	V0362	07/03/86
		000TS64151	60.87	V0362	07/03/86
		OTRIS64802	311.00	V0366	07/07/86
		000TS64802	157.14	V0366	07/07/86
		SUBTOTAL \$	1097.45		
LEBLANC, PAULINE M.	86	OTRIS64801	311.00	V0362	07/03/86
		000TS64801	217.86	V0362	07/03/86
	87	OTRIS70997	282.00	V0126	12/10/86
		000TS70997	239.22	V0126	12/10/86
		OTRIS66570	158.00	V0015	10/07/86
		000TS66570	41.16	V0015	10/07/86
		SUBTOTAL \$	1249.24		
LUPTON, JANE MARGARET	87	OTRIS71049	210.00	V0119	12/05/86
		000TS71049	117.50	V0119	12/05/86
		OTRIS64137	158.00	JV001	10/28/86
		000TS64137	116.05	JV001	10/28/86
		OTRIS66575	158.00	V0020	10/10/86
		000TS66575	12.50	V0020	10/10/86
		SUBTOTAL \$	772.05		

TOTAL EPA REGIONAL TRAVEL \$ 3330.74

COST SUMMARY DATE: 11/22/89
ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)
Prepared: 10/09/86
Cost Data From 10/01/69 To 03/31/87

Page 1

UNIDENTIFIED (UNI) CONTRACT

CONTRACTOR:

CONTRACT NO: 5391

PROJECT OFFICER:

DATES OF SERVICE: FROM: / / TO: / /

SUMMARY OF SERVICE:

TOTAL CONTRACTOR COST: \$ 30.00

DOCUMENTATION: Copies of Applicable Paid Vouchers and Treasury Schedules

VOUCHER NUMBER -----	VOUCHER DATE -----	VOUCHER AMOUNT -----	TREASURY SCHEDULE NUMBER AND TRANSACTION DATE -----	SITE AMOUNT -----
LUPTON J.	/ /	0.00	V0259 03/23/87	30.00